

1 Rena Andoh (admitted *pro hac vice*)  
2 randoh@sheppardmullin.com.com  
3 **SHEPPARD, MULLIN, RICHTER**  
4 **& HAMPTON LLP**

30 Rockefeller Plaza  
New York, NY 10112  
Telephone: (212) 653-8700  
Facsimile: (212) 653-8701

6 Lai L. Yip (SBN 258029)  
7 lyip@sheppardmullin.com  
8 Four Embarcadero Center, 17<sup>th</sup> Floor  
9 San Francisco, CA 94111  
10 Telephone: (415) 434-9100  
11 Facsimile: (415) 434-3947

12 Travis J. Anderson (SBN 265540)  
13 tanderson@sheppardmullin.com  
14 12275 El Camino Real  
15 Suite 100  
16 San Diego, CA 92130  
17 Telephone: (858) 720-8900  
18 Facsimile: (858) 509-3691

19 Kazim A. Naqvi (SBN 300438)  
20 knaqvi@sheppardmullin.com  
21 1901 Avenue of the Stars  
22 Suite 1600  
23 Los Angeles, CA 90067  
24 Telephone: (310) 228-3700  
25 Facsimile: (310) 228-3701

26 Attorneys for Plaintiff and  
27 Counterdefendant Moog Inc.

28 **UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT ALIN  
PILKINGTON, MISOOK KIM, and  
DOES NOS.1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR  
*Hon. George H. Wu*

**DECLARATION OF KAZIM A.  
NAQVI IN SUPPORT OF REPLY  
BRIEF IN SUPPORT OF  
PLAINTIFF AND COUNTER-  
DEFENDANT MOOG INC.'S  
NOTICE OF MOTION AND  
MOTION TO ENFORCE  
COMPLIANCE WITH THE  
MARCH 11, 2022 STIPULATED**

**TRO (DKT. 25), AND FOR  
MONETARY AND ADVERSE  
INFERENCE SANCTIONS FOR  
CONTEMPT AND SPOLIATION**

*[Filed concurrently with Reply Brief]*

Date: June 15, 2023

Time: 8:30 a.m.

Ctrm.: 9-D

Complaint Filed: March 7, 2022

Counterclaims Filed: January 30, 2023

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**DECLARATION OF KAZIM A. NAQVI**

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2 1. KAZIM NAQVI, under penalty of perjury and pursuant to 28 U.S.C.  
3 § 1746, declares the following to be true and correct:

4 2. My name is Kazim Naqvi. I am an associate at Sheppard, Mullin,  
5 Richter & Hampton LLP. I am over the age of 18 years old. I have personal  
6 knowledge of the matters set forth herein and if called as a witness, I could and  
7 would competently testify as to all facts set forth herein. I am counsel for plaintiff  
8 and counterdefendant Moog Inc. (“Moog”) and I provide this declaration in  
9 support of Moog’s Reply in Support of Motion to Enforce Compliance with the  
10 March 11, 2022 Stipulated TRO (Dkt. 25), and for Monetary and Adverse  
11 Inference Sanctions for Contempt and Spoliation (the “Reply”).

12 3. Relevant excerpts from the final deposition transcript of Michael J.  
13 Dreikorn, deposited on May 2, 2023, and cited in Moog’s Reply are attached hereto  
14 as Exhibit “A.”

15 4. Relevant excerpts from the final deposition transcript of Nikolaus  
16 Baer, deposited on May 2, 2023, and cited in Moog’s Reply are attached hereto as  
17 Exhibit “B.”

18 5. Relevant excerpts from the final deposition transcript of Stephen Koo,  
19 deposited on May 3, 2023, and cited in Moog’s Reply are attached hereto as Exhibit  
20 “C.”

21 6. Relevant excerpts from the final deposition transcript of Michael  
22 Bandemer, deposited on May 26, 2023, and cited in Moog’s Reply are attached  
23 hereto as Exhibit “D.”

24 7. A true and correct copy of e-mail correspondence between counsel for  
25 Moog and Skyryse between May 1, 2023 and May 10, 2023, wherein Moog’s  
26 counsel requests production of certain materials that Skyryse’s expert witness  
27 Michael Bandemer relied upon in his declaration in support of Skyryse’s  
28 Opposition to Moog’s Motion to Enforce filed on April 24, 2023 (Dkt. 454), is

1 attached hereto as Exhibit “E.”

2 I declare that the foregoing is true and correct under penalty of perjury  
3 under the laws of the United States of America.

4 Executed this 1st day of June, 2023, in Los Angeles, California.

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6 Dated: June 1, 2023

7 /s/ *Kazim Naqvi*

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